

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Priority Mail, Tracking Number, 9505 5139 5201 0101 7989 13,  
addressed to Anthony King, 1704 NW 43<sup>rd</sup> Ave, Camas, Wa 98607,  
with a return address of William Schultz, 1829 Tilden Ave, Norwood,  
Oh 45212.

Case No. 1:20-mj-295

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail, Tracking Number, 9505 5139 5201 0101 7989 13, addressed to Anthony King, 1704 NW 43<sup>rd</sup> Ave, Camas, Wa 98607, with a return address of William Schultz, 1829 Tilden Ave, Norwood, Oh 45212.

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of: Title 21

Code Section	Offense Description
21 U.S.C. 841 (a) (1)	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector Jason R. Roth

- ☒ Continued on the attached sheet.  
☐ Delayed notice \_\_\_\_\_ days (give exact ending date if more than 30 \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*Jason R. Roth*  
Applicant's signature

Jason R. Roth, U.S. Postal Inspector  
Printed name and title

Sworn to before me and signed in my presence.  
via electronic means

Date: Apr 13, 2020

City and state: Cincinnati, Ohio

*Karen L. Litkovitz*  
Karen L. Litkovitz  
United States Magistrate Judge



**AFFIDAVIT**

I, Jason R. Roth, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since February 23, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. Your Affiant completed United States Postal Inspection Service Basic Training in May 2013. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, your Affiant has worked since May 2013 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of a search warrant for the following property, namely a package associated with the following United States Postal Service (USPS) Priority Mail, Tracking Number:

a. **9505 5139 5201 0101 7989 13** (the "Package")

This Affidavit is made in support of a warrant to search the Package for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offense:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the Package, it does not include every fact known concerning this investigation, I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the Package. The Package is currently located at the USPIS Cincinnati Field Office.

4. Your Affiant has become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, your Affiant has learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion - false or non-existent return address,

addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. Through training and experience, your Affiant realizes it is not uncommon for drug traffickers engaging in drug transactions through the mail to store narcotics, their proceeds, or packaging materials, etc., in the presence of one another. Therefore, it would not be uncommon for an odor of a controlled substance to be present on the package, packaging materials, or contents of the package, including financial proceeds from narcotics trafficking such as cash, money orders, or other financial instruments.
6. On or about March 17, 2020, your Affiant applied for and was granted a Federal Search Warrant for USPS Priority Mail, Tracking Number: 9505 5139 5201 0071 7780 83, addressed to Travis Hayes, 22466 Rambling Oaks Dr., Grass Valley, Ca 95949-8347, with a return address of Pay Ayers, 2081 Wood Brook Ct, Loveland, Oh 45140. Inside the package was \$60,030 of United States Currency of suspected narcotic proceeds. The United States Currency was wrapped in duct tape.
7. On or about March 23, 2020, your Affiant applied for and was granted two additional Federal Search Warrants for USPS Priority Mail, Tracking Numbers: 9505 5161 6466 0076 1612 70 and 9505 5161 6466 0078 1617 11, both addressed to Daniel Mitchem, 1121 Harrison Ave #198, Centralia, WA 98531, with a return address of Jessica Walton, 2106 Wood Brook Ct, Loveland, OH 45140. The packages were found to contain \$60,900 and \$14,960 of United States Currency of suspected narcotic proceeds. The United States Currency was wrapped in duct tape.
8. On or about April 10, 2020, your Affiant applied for and was granted an additional Federal Search Warrant for USPS Priority Mail, Tracking Number: 9505 5140 4956 0100 6212 69, addressed to Elizabeth Bowman, 501 133<sup>rd</sup> Ave SE, Rainier, Wa 98576, with a return address of Ruscellos Salon, 247 W Central Ave #A, Springboro, Oh 45066. The package was found to contain \$49,900 of United States Currency of suspected narcotic proceeds. The United States Currency was wrapped in duct tape.
9. On or about April 9, 2020, during a review of postal mailings, your Affiant identified the Package at the Milford Post Office, Milford, OH. Observation of the Package indicates it is Priority Mail, Medium Flat Rate Box and weighs approximately 3 pounds and 12 ounces. Postage paid for was \$15.05. Additionally, it has pictorially similar handwriting as the packages mentioned in paragraph 6 and 8.

The Package is further described as:

**Priority Mail, Tracking Number: 9505 5139 5201 0101 7989 13**

**Sender:** William Schultz  
1829 Tilden Ave  
Norwood, Oh 45212

**Addressee:** Anthony King  
1704 NW 43<sup>rd</sup> Ave  
Camas, Wa 98607

10. The Consolidated Lead Evaluation and Reporting (CLEAR) database system was researched by your Affiant regarding the listed return address on the Package: William Schultz, 1829 Tilden Ave, Norwood, Oh 45212. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated there is was a William Schuetz associated with 1829 Tilden Ave Fl #2, Cincinnati, OH 45212 in October 2019.
11. The CLEAR database was researched by your Affiant regarding the listed addressee on the Package: Anthony King, 1704 NW 43<sup>rd</sup> Ave, Camas, Wa 98607. The information obtained from the system indicated there is a Anthony King associated with that address.
12. On or about April 13, 2020, your Affiant arranged for Deputy Nick Poole, Hamilton County Sherriff's Office, to utilize a narcotics canine to check the Package. Deputy Poole and his canine "Akim" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Office of the Attorney General (Ohio). Deputy Poole reports that "Akim" passed all of his examinations and has successfully located hidden drugs in the past and therefore your Affiant considers "Akim" to be reliable. On the same date, your Affiant met Deputy Poole at the USPS Cincinnati Field Office where the Package was placed in separate office among several other similar packages and presented to narcotic canine, "Akim", who alerted positively to the presence or odor of a controlled substance upon the Package.

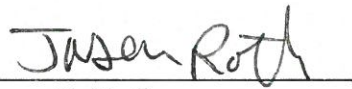
Attached herewith, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.

13. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Akim" is indicative of the Package containing narcotics or proceeds relating thereof.

14. Based upon the information contained in this Affidavit, your Affiant believes that there is probable cause to believe that the Package will contain evidence and/or contraband, fruits of crime, or other items illegally possessed.

Therefore, a search warrant to open the Package is requested.

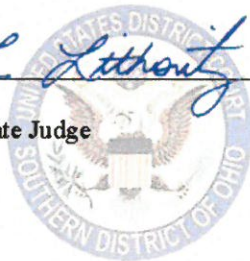
Further, your Affiant sayeth naught.



Jason R. Roth  
U.S. Postal Inspector

Subscribed and sworn to and before me this 13th day of April, 2020

  
Karen L. Litkovitz  
United States Magistrate Judge





United States Postal Inspection Service  
Pittsburgh Division

### OFFICER AFFIDAVIT

I, DEPUTY N. POOLE, AM, AND HAVE BEEN, EMPLOYED BY THE HAMILTON COUNTY SHERIFF'S OFFICE, SINCE 2004. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "AKIM", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

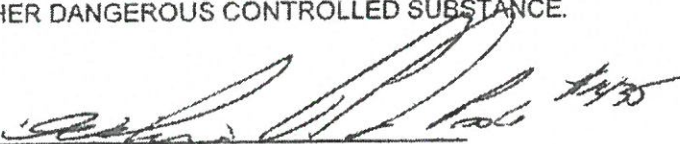
Marijuana, Hashish, Cocaine, Heroin, Methamphetamines, Ecstasy

ON 04/13/2020, AT THE REQUEST OF POSTAL INSPECTOR J.R. ROTH I RESPONDED TO THE US POSTAL INSPECTION SERVICE CINCINNATI FIELD OFFICE WHERE "AKIM" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

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USPS Priority Mail, USPS Tracking Number: 9505 5139 5201 0101 7989 13, addressed to Anthony King, 1704 NW 43<sup>rd</sup> Ave, Camas, Wa 98607, with a return address of William Schultz, 1829 Tilden Ave, Norwood, Oh 45212.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "AKIM", I CONSIDER THE ABOVE DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.

  
(Signature and Date)